Before the Federal Communications Commission 445 12th Street, SW Washington DC 20554

In the Matter of:		
Expedited Consideration for Declaratory Rulings)	
On the transfer of traffic only under AT&T)	
Tariff Section 2.1.8, and Related Issues.)	
·)	
Primary Jurisdiction Referral)	
from the NJ District Court)	
)	CCB/CPD 96-20
)	DA - 06-2360
)	WC Docket No. 06-
210		
One Stop Financial, Inc)	
Group Discounts, Inc.)	
Winback & Conserve Program, Inc.)	
800 Discounts, Inc.)	
Petitioners)	
)	
and)	
AT&T Corp.)	
Respondent)	

PETITIONER'S COMMENTS ON AT&T's REQUEST TO FILE ADDITIONAL COMMENTS

To FCC:
Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary

Ms. Deena Shetler Via ECFS and email: <u>Deena.Shetler@fcc.gov</u> Copy: <u>fcc@bcpiweb.com</u>

One Stop Financial, Inc., Group Discounts, Inc., 800 Discounts, Inc. and Winback & Conserve Program, Inc

Feb. 1st 2007 Ms. Shetler

1) Petitioners would like to address this comment by AT&T. The nature of our comment will not be on the merits of the case but on AT&T's request to supplement the record. AT&T wrote:

Petitioners failed to file comments on December 20, 2006, the date the Commission set for opening comments, thereby depriving AT&T of the opportunity to address by way of reply comments any new or additional arguments petitioners might advance in support of their "interpretation" of the tariff. Should petitioners file reply comments on the current due date or at some later date, AT&T reserves the right to respond to any new arguments petitioners seek to assert.

2) AT&T claims petitioners failed to file comments as if petitioners were obligated to do so; there is no such requirement. The comments petitioners provided dealt with the same issues that its September 27th 2006 filing included and petitioners Jan 31st 2007 comments simply responded to all issues raised by AT&T's Dec. 20th 2006 comments.

By AT&T arguing to the District Court that there are no disputed facts and all issues are interpretative AT&T got what it wanted. Petitioners were required to file first at the FCC.

- 3) Petitioners asked to go back to the District Court and settle any alleged disputed facts that AT&T came up with after it left the District Court; AT&T didn't like that either. AT&T's threatening petitioners that AT&T would ask the District Court for sanctions was not a deterrent.
- 4) Petitioners simply decided to put faith in its argument as to why the other open issues should be heard. AT&T states "should petitioners file reply comments AT&T reserves the right to respond". I think when petitioners asked for additional time to respond that should have given AT&T a little hint that petitioners were going to respond. AT&T has already filed over 200 pages. Enough is enough! Now that the writing is on the wall, AT&T wants another bite at the apple. No way! Petitioners strongly oppose AT&T's request.
- 5) Just As AT&T opposed petitioners request to go back to the District Court to settle AT&T's "newly discovered" post District Court disputes, petitioners oppose AT&T's request to waste more time throwing more of "it" up against the wall to see if it sticks.

The FCC asked petitioners not to raise the tax investigations issue and just stick to the traffic transfer issue and the shortfall issues that Judge Politan referred, and petitioners adhered to the FCC's wish.

AT&T	got what i	t wanted fi	om Judge	e Bassler	now A'	T&T s	hould l	nave to	deal
with it	<u>.</u>								

Respectfully Submitted,

One Stop Financial, Inc Group Discounts, Inc Winback & Conserve

Program, Inc

800 Discounts, Inc.

By: /s/ Al Inga

Al Inga Its'

 $\begin{array}{c} \text{Feb } 1^{\text{st}} \ 2007 \\ \text{President} \end{array}$